RESPONSE OF MID-MISSOURI CELLULAR TO ADDITIONAL DATA REQUEST OF ALMA TELEPHONE COMPANY

D.R. No. 20 Please provide copies of all Business Plans of Mid-Missouri Cellular as referenced in the Direct Testimony of Michael K. Kurtis, page 2, from inception to date.

This data request appears to interpret the phrase "MMC's business plan," on page 2 of the Kurtis Direct Testimony, as referring to one or more financial business plans that provide revenue, expense and net income projections, and assumptions about subscribers, air-time and roaming rates, costs *etc.* supporting those projections. That interpretation is incorrect. Rather, placed in context, the "business plan" mentioned in the Kurtis Direct Testimony refers to MMC's general plans for its system's original design and implementation and for its continuing expansion and improvement. These general plans, for example, involve the addition of cell sites to convert the system from one originally designed primarily to serve three watt vehicular subscriber units (with antennas mounted on the vehicle exterior) to one which serves low power portable handsets (with no exterior antennas). Another example of a general plan, within the meaning of the Kurtis Direct Testimony at page 2 was the process of transitioning MMC's exclusively analog cellular network to one that also offers digital capability. Mr. Kurtis does not posses any financial business plans as requested in D.R. No. 20.

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